



Order Filed on June 11, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>
Caption in compliance with D.N.J. LBR 9004-2(c)
Mester & Schwartz, P.C. Jason Brett Schwartz, Esquire Bar No. 4217 1917 Brown Street Philadelphia, PA 19130 (267) 909-9036
<b>In Re:</b>
<b>KATHERINE E. PARKER a/k/a KATHLEEN E. PARKER, Debtor,</b>

Case No.: 16-28226-ABA

Judge: Andrew B. Altenburg Jr.

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE  
2015 JEEP RENEGADE LATITUDE SPORT UTILITY 4D**

The relief set forth on the following pages, number two (2) through four (4) is hereby  
**ORDERED.**

**DATED: June 11, 2021**

  
\_\_\_\_\_  
Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

2

Debtor: Katherine E. Parker  
Case No.: 16-28226-ABA  
Caption of Order: Consent Order Modifying Stay as To Personal Property

---

1. The 11 U.S.C. § 362(a) Stay as to Steward Financial Services, its successors and/or assigns ("Movant"), with respect to the personal property of the Debtor described as a 2015 Jeep Renegade Latitude Sport Utility 4D, V.I.N. ZACCJBBT3FPC03741, in accordance with the agreement of the Debtor and Movant, is hereby modified and shall remain in effect PROVIDED THAT Debtor complies with the following terms and conditions:
  - (a) Debtor is current with respect to post-petition payments that have come due through June 9, 2021.
  - (b) Debtor will resume making all future regular monthly installment payments of \$324.14 (subject to changes for taxes, insurance costs and late fees, if any) beginning on July 7, 2021; Debtor will timely make each payment in accordance with the terms and conditions of the loan document between Debtor and Movant.
2. Debtor will remain current on all payments ripe, due and owing under the terms of the Chapter 13 Plan. Debtor will pay Movant as an administrative expense through the Chapter 13 Plan the sum of \$313.00 for attorney's fees and costs.
3. The term "payment" as set forth in Paragraph 1, *supra*, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.

3

Debtor: Katherine E. Parker

Case No.: 16-28226-ABA

Caption of Order: Consent Order Modifying Stay as To Personal Property

---

4. Debtor will be in default under the Consent Order in the event that Debtor fails to comply with the payment terms and conditions set forth in Paragraph 1, *supra*. If Debtor fail to cure the default within thirty (30) days from the date of default, Movant may apply on five days' notice to Debtor and counsel for Debtor and the Chapter 13 Trustee for an order lifting the automatic stays imposed under 11 U.S.C. § 362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.
5. In the event Debtor converts to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtor shall pay all pre-petition arrears and post-petition arrears due and owing within fifteen (15) days from the date the case is converted from Chapter 13 to any other Chapter. If Debtor fails to make payments in accordance with this paragraph, then Movant, through counsel, may file a Certification of Default setting forth said failure and Movant shall be granted immediate relief from the automatic stay provision of Section 362 of the Bankruptcy Code (11 U.S.C. § 362) and the Movant is then permitted to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle.

4

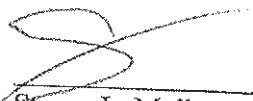
Debtor: Katherine E. Parker  
Case No.: 16-28226-ABA  
Caption of Order: Consent Order Modifying Stay as To Personal Property

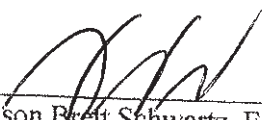
---

6. The failure of Movant to issue a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

7. Debtor waives the fourteen (14) day stay provided under Rule 4001(a)(3), F.R.B.P.

**We hereby Consent to the form and entry of the foregoing Order.**

  
\_\_\_\_\_  
Stacey L. Mullen, Esquire  
Law Office of Stacey L. Mullen  
2091 N. Springdale Rd., Suite 17  
Cherry Hill, NJ 08003  
Attorney for Debtor

  
\_\_\_\_\_  
Jason Brett Schwartz, Esquire  
Mester & Schwartz, P.C.  
1917 Brown Street  
Philadelphia, PA 19130  
Attorney for Steward Financial Services